

Exhibit A



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November 19, 2024

VIA CERTIFIED MAIL (RETURN RECEIPT)
(RECEIPT NO. 7021 2720 0001 0088 7832)

Mr. Tim Cook, CEO
Apple, Inc.
One Apple Park Way
Cupertino, CA 95014

Dear Mr. Cook:

We represent Sandeep Kapil, Gabriela Gomez, Kim Sallen and a putative class of similarly situated Apple customers. Our clients contend that Apple misrepresents that apps downloaded from the Apple App Store could be trusted and were safe and secure because of Apple's rigorous vetting and review process.

In offering apps for download in the App Store onto Apple devices, Apple represented that App Store apps are safe for use on the Apple devices, that "the App Store has proved to be a safe and trusted place to discover and download apps," that Apple is "[d]edicated to trust and safety," that "Apps must adhere to our guidelines," that "[e]very week, over 500 dedicated experts around the world review over 100 Apps," and that "[o]ver 1M submissions [were] rejected for objectionable, harmful, unsafe, or illegal content."

As a result of these and other representations detailed in the attached class action complaint, our clients purchased iPhones and iPads and downloaded and used the Digicoins, SolLuna, and/or Forex5 apps from the App Store. Contrary to Apple's representations, these apps were not safe and in compliance with legal requirements. These apps were designed and used as "pig butchering" financial scams through which our clients lost significant amounts of money. Apple's conduct constitutes unlawful, unfair, and fraudulent practices in violation of the Unfair Competition Law, Business and Professions Code §§ 17200, *et seq.*

Apple also violates the Consumers Legal Remedies Act ("CLRA"), California Civil Code §§ 1750, *et seq.* Apple's practices violate California Civil Code §§ 1770(a) under, *inter alia*, the following subdivisions:

- (2) Misrepresenting the source, sponsorship, approval, or certification of goods or services.
- (5) Representing that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities that they do not have or that a person has a sponsorship, approval, status, affiliation, or connection that the person does not have.



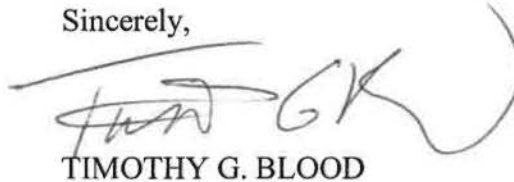
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- (7) Representing that goods or services are of a particular standard, quality, or grade, or that goods are of a particular style or model if they are of another.
- (9) Advertising goods or services with intent not to sell them as advertised.

Pursuant to California Civil Code § 1782 we hereby demand on behalf of our clients and all others similarly situated that Apple correct and rectify these violations by compensating our clients and members of the class for the losses they have incurred because of Apple's misconduct and that Apple take action to correct its misrepresentations. Please inform us within 30 days of your intention to take corrective action after which time we will proceed to file the complaint and pursue legal remedies.

We await your response.

Sincerely,



TIMOTHY G. BLOOD

TGB:jk

Enclosure